



U.S. Department of Justice

United States Attorney
Southern District of New York

United States Attorney's Office
50 Main Street, Suite 1100
White Plains, New York 10606

March 7, 2023

BY ECF AND EMAIL

The Honorable Cathy Seibel
United States District Judge
Southern District of New York
Hon. Charles L. Brieant, Jr.
Federal Building and United States Courthouse
White Plains, New York 10601

Re: *United States v. Jovann Martin*, No. 22 Cr. 639 (CS)

Dear Judge Seibel:

The Government writes respectfully to request that the status conference scheduled for Friday, March 10, 2023, be adjourned by approximately forty-five days. The defendant joins this request. This adjournment would enable the defendant to review discovery the Government produced about two weeks ago after the completion of a responsiveness review. The defendant, who is in custody, reports that his ability to review discovery is limited because of scheduling issues at the jail's facilities.

Should this adjournment be granted, the Government respectfully moves for the exclusion of time under the Speedy Trial Act between now and the next conference in this matter. Such an exclusion would serve the ends of justice, as it will allow the parties to review discovery, consider potential motion practice, and discuss a potential resolution of the matter without the need for trial. The defendant consents to the exclusion of time.

Conference adjourned to 4/26/23 at 10:30 am. The time between now and 4/26/23 is hereby excluded under the Speedy Trial Act in the interests of justice. The ends of justice served by the exclusion outweigh the best interests of the public and the defendant in a speedy trial because it will enable Defendant and his counsel to review the discovery, and because it will permit discussion of a potential disposition without trial.

Respectfully submitted,


DAMIAN WILLIAMS
United States Attorney for the
Southern District of New York

SO ORDERED.


CATHY SEIBEL, U.S.D.J.

3/7/23

By:


Ryan W. Allison
Assistant United States Attorney
(914) 993-1953

cc: Defense counsel (by ECF and Email)